

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED
DEC 20 2018
U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARRON PRIMUS,

Defendant.

4:18CR1046 HEA/SPM

INDICTMENT

COUNT 1 (18 U.S.C. 1591(a)(1))

The Grand Jury charges that:

Between on or about November 25, 2018 and November 27, 2018, within the Eastern District of Missouri, the defendant,

CARRON PRIMUS,

in and affecting interstate and foreign commerce, did knowingly and intentionally attempt, recruit, entice, harbor, transport, provide, or obtain by any means a person, Juvenile A, knowing that force, fraud, or coercion would be used to cause the person to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a) and (b), and Title 18, United States Code, Section 1594(a).

COUNT 2 (18 U.S.C. 1952(a)(3))

The Grand Jury further charges that:

Between on or about November 25, 2018 and November 27, 2018, within the Eastern District of Missouri, the defendant,

CARRON PRIMUS,

did knowingly use facilities in interstate commerce, that is the internet, with the intent to promote, manage, establish, and carry on an unlawful activity, to wit: prostitution, and thereafter did knowingly promote, manage, establish and carry on that unlawful activity.

In violation of Title 18, United States Code, Section 1952(a)(3).

COUNT 3 (18 U.S.C. 1952(a)(3))

The Grand Jury further charges that:

Between on or about November 25, 2018 and November 27, 2018, within the Eastern District of Missouri, the defendant,

CARRON PRIMUS,

did knowingly use facilities in interstate commerce, that is a cellular phone, with the intent to promote, manage, establish, and carry on an unlawful activity, to wit: prostitution, and thereafter did knowingly promote, manage, establish and carry on that unlawful activity.

In violation of Title 18, United States Code, Section 1952(a)(3).

A TRUE BILL.

FOREPERSON

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